

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION

BRENDA DAVIS, et al.,)
Plaintiffs,) Case No.: 5:17-cv-06058-SJ-NKL
)
v.)
BUCHANAN COUNTY, MISSOURI, et al.,)
Defendants.)
)
)
)
)
)

**DEFENDANTS DR. CATHERINE VAN VOORN, ANN SLAGLE, AND APRIL
HELSEL'S MOTION TO DISMISS BASED ON QUALIFIED IMMUNITY**

COME NOW defendants Dr. Catherine Van Voorn, Ann Slagle, and April Helsel, by and through the undersigned counsel, and move this Court for an order dismissing plaintiffs' claims on the basis of qualified immunity. Defendants contemporaneously submit herewith their *Suggestions in Support* of this Motion to Dismiss.

WHEREFORE, defendants Dr. Catherine Van Voorn, Ann Slagle, and April Helsel respectfully request this Court grant their Motion to Dismiss Based on Qualified Immunity.

**NORRIS KEPLINGER
HICKS & WELDER, LLC**

By: /s/ John Hicks
John Hicks, jh@nkfirm.com, #53584
Emily Tung, etung@nkfirm.com, #68177
9225 Indian Creek Parkway, Suite 750
Overland Park, Kansas 66210
(913) 663-2000/(913) 663-2006 FAX
ATTORNEYS FOR DEFENDANTS APRIL
POWERS, ANN MARIE SLAGLE, CATHERINE
VAN VOORN, ADVANCED CORRECTIONAL
HEALTHCARE

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of July, 2019, the above and foregoing document was filed and served on counsel of record via the Court's ECF system.

/s/ John Hicks
Attorney for Defendant Advanced Correctional
Healthcare, Inc.